

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WISCONSIN**

EPIC SYSTEMS CORPORATION,

Plaintiff,

v.

**YOURCAREUNIVERSE, INC., MEDHOST,
INC., AND MEDHOST SOLUTIONS CORP.**

Defendants.

Case No. 3:15-cv-00821-bbc

DECLARATION OF WILLIAM ANDERSON

William Anderson hereby declares as follows:

1. My name is William Anderson. I am over the age of twenty-one and a resident of Fulton County, Georgia. The statements made herein are based upon my personal knowledge.
2. I am the Chief Executive Officer of MEDHOST, Inc. ("MEDHOST") and MEDHOST Solutions Corp. ("Solutions").
3. MEDHOST is a Delaware corporation with a principal place of business in Cleveland, Ohio.
4. MEDHOST was formerly known as HealthTech Holdings, Inc. MEDHOST is strictly a non-operational holding company.
5. MEDHOST's senior credit agreement contains a negative covenant prohibiting MEDHOST from conducting any business operations, outside of a limited allowance for consulting services primarily intended to address MEDHOST's relationship with its largest private equity investor.

6. MEDHOST sells no products or services whatsoever, whether related to the YOURCAREEVERYWHERE Mark at issue in this litigation or otherwise.

7. MEDHOST does not maintain any office or place of business in Wisconsin, and it does not own, rent, or lease any real or personal property within the State of Wisconsin.

8. As a non-operational holding company, MEDHOST has no employees, agents, or representatives who work out of Wisconsin.

9. MEDHOST also does not maintain any bank accounts, telephone numbers, or any other link to Wisconsin.

10. Aside from its legal status as the indirect corporate parent of YCU in the companies' organizational hierarchy, MEDHOST has no control over the day-to-day business operations of YCU or the YOURCAREEVERYWHERE trademark.

11. Solutions is a Delaware corporation with a principal place of business in Franklin, Tennessee.

12. Although not strictly a holding company, Solutions has limited business operations. Solutions' operations are limited to a small number of contractual relationships with certain vendors, none of which are related in any way to the YOURCAREEVERYWHERE Mark at issue here.


13. Solutions sells no products or services, whether related to the YOURCAREEVERYWHERE Mark at issue in this litigation or otherwise, and Solutions does not direct or control the operations of YCU or its use of the YOURCAREEVERYWHERE Mark.

14. As with MEDHOST, Solutions has no office or place of business in Wisconsin and it does not own, rent, or lease any real or personal property within the State of Wisconsin.

15. Solutions has no employees, no bank accounts, no phone lines, or any other substantial contacts with Wisconsin.

I hereby declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: 1/12/14



William Anderson